



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 26, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Greg B. Lam, Esq.
Copilevitz & Canter
423 W. Eighth Street
Suite 400
Kansas City, Missouri 64105

RE: MUR 3774

Dear Mr. Lam:

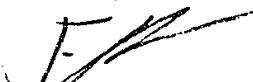
We are in receipt of your letter of June 11, 1997. Your clients' recent responses and production of documents to the Commission's Subpoena and Order of February 11, 1997 necessarily raise additional questions. In this most recent response, your clients identify Optima Direct, Inc. as the entity with whom they subcontracted regarding the 1994 Senate phone bank activity. Please now describe the circumstances surrounding the obtainment of the subcontract. Specifically, identify the individuals or entities who informed your clients regarding the availability of the subcontract as well as all entities and individuals with whom your clients discussed the subcontract. Also, state if your clients performed any other prior subcontract activity for Optima Direct. If so, please describe by date, purpose, subject matter of calls, and costs these other activities.

Concerning the documents, you clients produced a series of eleven schedules detailing the various calls made under the subcontract, each schedule containing a code identify the calls. These codes are: CAMPAIGN NL201A (mnvote); CAMPAIGN NL201B; CAMPAIGN GO410; CAMPAIGN GO410-II; CAMPAIGN CM530; CAMPAIGN MH211; CAMPAIGN MH212; CAMPAIGN MH213; CAMPAIGN NL180; CAMPAIGN NL181; CAMPAIGN NL182. Separately as to each code, please describe the political race or races involved in the calls, the geographic region encompassed by the calls (e.g., congressional district) and the time period during which the calls were made. Please also identify by name and owner the lists used to make the calls and state all costs related to use of the lists. Last, produce all scripts used in making the calls and identify their source. Concerning the invoice produced by your clients, state if the invoice was paid in full by Optima Direct and identify the person or entity subsequently billed by Optima Direct for these costs.

Last, in their response your clients note the availability of "records of payments received for subcontracted work;" however, they do not produce this information. In accordance with our February 11, 1997 subpoena, please produce the available payment records concerning the subcontract activity. Similarly, the response fails to address our request for bank records. As before, we request bank records concerning all accounts held by SEC, Inc. and related entities. Should your clients prefer, we can seek this information directly from the banks and require only the identification of all accounts by bank name, account holder and account number.

We request responses to these discovery requests within five business days. Should you have any questions, please contact me at (202) 219-3690.

Sincerely,



Jose M. Rodriguez
Attorney